

To: Delbert Hosemann  
 From: Derek Henderson  
 Re: Significant Fiduciary Experience  
 Date: May 17, 2018

## CHAPTER 7 TRUSTEE CASES:

As a panel Chapter 7 trustee, I administer on the average at least 1,000 cases per year. Since January 2008, I have handled 147 true “asset” cases where an estate was opened and assets liquidated with claims being paid. These range from small cases involving thousands of dollars to large cases involving millions of dollars. The following are just a few samples of significant and complex matters in which I have served as the trustee:

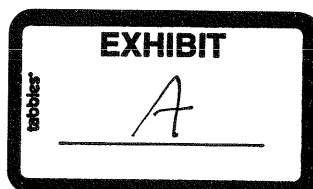
### - **Largest Insurance Company Fraud in State of Mississippi**

John Dan White	92-01939 ee
Guardian Trust Company (started as Receivership)	93-01033 ee
Andrew Jackson Corporation	92-03011 ee
White Enterprises, Inc.	92-03999 ee
Termplan, Inc.	92-04024 ee

These cases arose from the insolvency of the Mississippi-based Andrew Jackson Life Insurance Company and related entities and its principals. Administration of these cases required assertion of malpractice and related claims against major professional firms and multiple business transactions in several states and Mexico. Total claims in cases exceeded \$340 million. Criminal convictions.

### - **Largest Land Fraud, Ponzi Scheme, Title Insurance Fraud in State of Mississippi**

John Christopher Evans	09-03763 NPO
Colony Developers, Inc.	09-04016 NPO
Highland of Ridgeland, Inc.	09-04017 NPO
Twin City Commons Development Company, LLC	09-04091 NPO
Old Agency Business Park, Inc.	09-04101 NPO
Cedar Lake Investors, LLC	09-04102 NPO
Colony Construction Ltd.	09-04104 NPO
Madison Avenue Development Co., LLC	09-04109 NPO
Woodgreen Development Corporation	09-04120 NPO
Ridgeland Recreational Corp.	09-04125 NPO
Highland of Madison Development, Inc.	09-04214 NPO
JCE Construction	09-04369 NPO
C&L, Inc.	09-04489 NPO



In addition to these cases, I typically represent debtors and debtors-in-possession in bankruptcy cases and have successfully represented official committees in large and complex cases, including in Pursue Energy Corporation (02-05339 ee), with claims exceeding \$91.5 million (2,013 claims) and received 100% payment to all creditors. I have represented all types of constituents in bankruptcy cases and have prosecuted and defended numerous adversary proceedings and commercial litigation relating to insolvency matters.

#### RECEIVERSHIP CASES:

I have also served as a receiver in state court proceedings of various types. The following cases are all recent matters in which I have served or am currently serving as receiver:

- **KiOR Columbus, LLC**  
Chancery Court of Lowndes County, Mississippi Cause No. 2015-0022-B

Selected to serve as receiver for a failed green technology biofuel refinery designed and constructed to process wood fiber into fuel, with claims exceeding \$200 million. The parent company filed a parallel Chapter 11 proceeding in Delaware. The refinery was managed in its idle state while a sale process was undertaken, ultimately resulting in liquidation of the refinery components and distribution to claimants of the proceeds.

- **The Grove Plantation, LLC**  
*Cynthia Jones Cooper v. Claudia Jones Stephens*  
Chancery Court of Adams County, Mississippi, Case No. 2015-308

Served as Receiver in liquidation of a limited liability company. Paid all creditors 100% and made distribution of remaining assets to LLC members.

- **Dissolution of Ware Milling, Inc.**  
Chancery Court of Chickasaw County, Mississippi, Case No. 2017-1116-KMB
- **Dissolution of Chickasaw Farm Services, Inc.**  
**Dissolution of Chickasaw Grain Transportation, Inc.**  
**Dissolution of Ware Construction, Inc.**  
Chancery Court of Chickasaw County, Mississippi, Case No. 2017-1108-KMB

I currently serve as Receiver in the above four (4) “Ware” cases. Three (3) of the cases have fully operating businesses which are being maintained and operated. The cases are continuing to be marketed for liquidation. The value is estimated to be \$20-\$25 million.

- **Aldridge Operating Co., L.L.C.**  
*Thomas O. Kimbrell and T. O. Kimbrell, LLC*

vs.

*Aldridge Operating Co., L.L.C. and Courtney G. Aldridge*

Chancery Court of Adams County, Mississippi, Case No. 2017-616-W

I currently serve as Receiver for Aldridge Operating Co., L.L.C., the Operator of oil and gas wells with ownership and working interests in other wells. The company assets are believed to be worth \$2-\$3 million.

- **Dissolution of J.H. Haynes Electric Co.**

Chancery Court of Harrison County, Mississippi, Cause No. 24CH1:15-cv-00595

Represented largest creditor in case. Worked file until client paid in full.